# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

LADDY CURTIS VALENTINE and	)
RICHARD ELVIN KING, individually and	)
on behalf of those similarly situated,	)
	) Case No. 4:20-cv-01115
Plaintiffs,	)
v.	)
	)
BRYAN COLLIER, in his official capacity,	) Hon. Keith P. Ellison
ROBERT HERRERA, in his official capacity,	)
and TEXAS DEPARTMENT OF CRIMINAL	)
JUSTICE,	)
	)
Defendants.	)

# MOTION TO WITHDRAW MARK S. WERBNER

Pursuant to Local Rule 83.2, Plaintiff Laddy Curtis Valentine and Richard Elvin King ("Plaintiffs") file this Motion to Withdraw Mark S. Werbner as counsel for Plaintiffs. Mr. Werbner no longer works for Winston and Strawn LLP and is no longer participating in this case as an attorney for Plaintiffs. The attorneys listed on the below signature block will remain as counsel for Plaintiffs. This Moton is not filed for the purpose of delay, and the relief sought will not prejudice any party in this case as the remaining attorneys will continue to represent Plaintiffs. WHEREFORE, Plaintiffs, Laddy Curtis Valentine and Richard Elvin King respectfully requests that the Court grant this Motion and permit Ms. Villasenor to withdraw as counsel and be removed from the distribution list for electronic notices in the above-referenced case.

By:

Dated: February 24, 2021 Respectfully submitted,

#### WINSTON & STRAWN LLP

## THE EDWARDS LAW FIRM

Jeff Edwards
Texas Bar No. 24014406
Scott Medlock
Texas Bar No. 24044783
Michael Singley
Texas Bar No. 00794642
David James
Texas Bar No. 24092572
S.D. Tex. ID No. 2496580
The Haehnel Building
1101 East 11th Street
Austin, Texas 78702
Tel. (512) 623-7727
Fax (512) 623-7729

/s/ John R. Keville John R. Keville Attorney-in-Charge Texas Bar No. 00794085 S.D. Tex. ID No. 20922 jkeville@winston.com Denise Scofield Texas Bar No. 00784934 S.D. Tex. ID No. 1529 dscofield@winston.com Michael T. Murphy Texas Bar No. 24051098 S.D. Tex. ID No. 621098 mtmurphy@winston.com Brandon W. Duke Texas Bar No. 240994476 S.D. Tex. ID No. 2857734 bduke@winston.com Benjamin D. Williams Texas Bar No. 24072517 S.D. Tex. ID No. 1447500 bwilliams@winston.com Robert L. Green Texas Bar No. 24087625 S.D. Tex. ID No. 2535614 RLGreen@winston.com Corinne Stone Hockman Texas Bar No. 24102541 S.D. Tex. ID No. 3019917 CHockman@winston.com 800 Capital Street, Suite 2400 Houston, Texas 77002 Tel. (713) 651-2600 Fax (713) 651-2700

Counsel for Plaintiffs

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on all counsel of record on February 24, 2021 by filing it with the Court's CM/ECF system..

/s/ John R. Keville

John R. Keville